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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

CLASS ACTION

PEREZ-FARIAS, et. al.,

Plaintiffs,

vs.

GLOBAL HORIZONS, INC., et. al.,

Defendants.

No. 05 CV 3061 RHW

MEMORANDUM IN SUPPORT OF  
MOTION TO EXPEDITE HEARING  
ON PLAINTIFFS' MOTION TO  
WITHDRAW REQUEST TO OPT OUT  
OF CLASS DAMAGES FOR RUBEN  
HUMILDAD

**I. ARGUMENT**

MEMORANDUM IN SUPPORT OF MOTION TO  
EXPEDITE HEARING ON PLAINTIFFS' MOTION TO  
WITHDRAW REQUEST TO OPT OUT OF CLASS  
DAMAGES FOR RUBEN HUMILDAD - 1

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1 Pursuant to LR 7.1(h)(1), motions are normally heard at least 31 days  
2 following the filing of such motion. The Court may waive the time requirements  
3 of the rule on its own motion or on the written request of any party. LR 7.1(h)(6).  
4 The request shall set forth in detail the reason for an expedited hearing. *Id.*

5  
6 An expedited hearing on the Plaintiffs' Motion to Withdraw Request to Opt  
7 Out for Ruben Humildad is requested because if heard on the regular calendar, the  
8 motion would not be heard until February 23, 2009. A bench trial on the damages  
9 is scheduled on Monday, February 9, 2009 in this case. (Ct. Rec. 998).

10 Accordingly, Plaintiffs request that this Court expedite the hearing on their  
11 Motion to Withdraw Request to Opt Out for Ruben Humildad and have noted the  
12 hearing on Friday, February 6, 2009, so that this issue may be resolved in a timely  
13 manner.  
14

15 DATED this 23<sup>rd</sup> day of January, 2009.

16 COLUMBIA LEGAL SERVICES

PAINE HAMBLIN LLP

17 s/ Mirta Laura Contreras

s/ Richard W. Kuhling

18 Mirta Laura Contreras, WSBA #21721

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19 Attorneys for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of January, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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s/Yolanda B. Lopez  
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